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Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

SUPERFUND DIVISION

DEPARTMENT OF NATURAL RESOURCES

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January 7, 2016

Mr. Bradley Vann, Remedial Project Manager
Superfund Division
United States Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

RE: Comments on the West Lake Landfill Perimeter Air Monitoring Quarterly Report, West Lake Landfill in Bridgeton, Missouri

Dear Mr. Vann:

The Missouri Department of Natural Resources has completed its review of the above referenced document prepared by Auxier & Associates dated December 2015. We are providing comments on this report due to its potential for reference in both the Isolation Barrier and on-going Remedial Investigations. These comments have been compiled by the Department's Hazardous Waste Program, Federal Facilities Section.

Thank you for giving us the opportunity to review and comment on this document. If you have any questions pertaining to these comments please contact me by phone at (573) 751-8628, or by written correspondence at P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

HAZARDOUS WASTE PROGRAM

A handwritten signature in black ink, appearing to read "Ryan Seabaugh", is written over the typed name.

Ryan Seabaugh, P.E.
Federal Facilities Section

RS:rl

Enclosure: Report Comments



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Superfund

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Comments on the West Lake Landfill Perimeter Air Monitoring Quarterly Report January 7, 2016

General Comments:

- 1.) **Tables** - Tables 5, 7, 9, and 10 report data, but do not include units for the values. Not reporting units with data that is presented in a table format is confusing for the reader. It can become especially difficult when working with contaminant data that are commonly presented in several different ways.

For Table 10, the units of the reported values are discussed within the related text, but they are not included within the table. Due to the possibility that these tables might be inserted into other documents (much like Tables 5, 7, & 9 were drawn from another source); the units should be included within the table.

Please include units within all data tables.

SECTION SPECIFIC COMMENTS

- 2.) **Section 3.4 TLD Results** – This section reports an anomalous reading at station number 10, and further summarizes follow-up activity that occurred in order to determine a potential cause of the reading. No conclusion was drawn but a proposal to provide a “trip blank” was discussed for future samples.
 - a. Chain-of-custody records for TLD monitors are not included in the report, but these records may assist in tracking potential sources of anomalous readings. The SAP/QAPP associated with this does not appear to address chain of custody records for TLD monitors. Please include chain of custody records for ALL samples including TLD monitors. The QAPP may need to be updated to reflect this change.
 - b. Neither the report, nor the QAPP identifies portable field instruments or calibration and testing protocol of those instruments. In addition, it is not clear how “typical background” readings of field instruments are obtained or determined. Please update the QAPP or the report to detail field instrumentation, follow-up activities, and how background values are obtained.
 - c. It is not clear whether there is an accepted procedure for following up on anomalous results. Please update the QAPP and include details in the report on how TLD monitors were transported in addition to explaining how a trip blank is intended to assist in isolating a potential cause of the anomalous reading.

3.) Section 3.5 Radon Results & Appendix F Alpha Track Etch Detector Results - The lab results include a comment stating that the EPA protocol for long term testing of 91 to 365 days has not been met. The lab has also commented that the results are for informational purposes only. If the data is being used to determine if there is a need for more sophisticated equipment, the lab results should provide meaningful data. Please comply with required sample collection period protocol.

4.) Appendix I Field Data Forms –

- a. Some of the PM2.5 Field data forms have a loading rate that is significantly below the goal of 40 cfm. Potential effects on the quality of the presented data were not discussed. Please add more detailed discussion on the potential effects on the quality of data due to significantly reduced loading rates.
- b. Some of the PM2.5 Field data forms have high variation in loading rates during the sample period. Potential effects of a high ΔQ on the quality of the data were not discussed. Please add more detailed discussion on the potential effects on the quality of data due to high variability loading rates.

5.) Appendix J Chains of Custody - Chains of custody records for the track etch detectors and TLDs were not included. Based on previous comments, chain of custody records might be useful for all samples collected and should be included. Please include chain of custody records for all samples. The QAPP may need to be updated to reflect this change.